

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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August 12, 2021

**BY ECF**

The Honorable Judge J. Paul Oetken  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**RE: United States v. Daurell Chavis  
20 Cr. 192 (JPO)**

Dear Judge Oetken:

I write on behalf of my client, Daurell Chavis, to respectfully request that the Court modify Mr. Chavis's bail conditions to allow him to travel to the University of Albany on August 17, 2021 to take his daughter to college. Pretrial Services and the Government do not object to this request.

On February 11, 2020, Magistrate Judge Robert W. Lehrburger released Mr. Chavis on his own signature and imposed the following bail conditions: a \$50,000 personal recognizance bond, cosigned by two financially responsible persons; travel restricted to SDNY/EDNY; surrender of all travel documents and no new applications; pretrial supervision as directed by Pretrial Services; urinalysis; home detention with GPS monitoring; surrender of all weapons and firearms; and no contact with co-defendants unless in the presence of counsel. Mr. Chavis's bail conditions were timely satisfied.

On February 21, 2020 before Magistrate Judge Sarah Cave, the defense requested that Mr. Chavis's bail conditions be modified to remove home detention and electronic monitoring. Magistrate Judge Cave denied this request. On June 2, 2020, with the consent of Pretrial Services and the Government, the defense again requested that Mr. Chavis's bail conditions be modified to remove home detention and electronic monitoring. The following day, the Court granted the bail modification, removing the condition of home detention and replacing it with a curfew as determined by Pretrial Services with GPS location monitoring.

Mr. Chavis has been on pretrial supervision for more than one year. In that time, he has remained compliant with his conditions of release. Mr. Chavis's oldest daughter recently graduated from high school with plans to attend the University of Albany this fall. Mr. Chavis

would greatly appreciate the opportunity to travel to Albany to bring his daughter to school on August 17, 2021. Pretrial Services and the Government do not object to this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Marne L. Lenox  
Assistant Federal Defender  
(212) 417-8721

**SO ORDERED:**

8/13/2021

  
J. PAUL OETKEN  
United States District Judge

cc: Ni Qian, Assistant U.S. Attorney  
Sheb Swett, Assistant U.S. Attorney  
Joshua Rothman, Intensive Supervision Specialist